

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

In re:

Case No. 19-40883-659
CHAPTER 11

PAYLESS HOLDINGS LLC *et al.*,

(Jointly Administered)

Debtors.

NOTICE OF APPEARANCE AND REQUEST FOR SERVICE

PLEASE TAKE NOTICE that landlords, **PLAZA LAS AMERICAS, INC.** and **PLAZA DEL CARIBE, S.E.**, by their attorneys at HOLLAND & KNIGHT LLP appear in this matter pursuant to Bankruptcy Rules 2002 and 9010 and Sections 102(1), 342 and 1109(b) of the Bankruptcy Code and request that all notices given or required to be given in this case and all papers served or required to be served in this case, be given to and served upon the following:

Joaquin J. Alemany, Esq.
HOLLAND & KNIGHT LLP
701 Brickell Avenue, Suite 3300
Miami, Florida 33131
Tel.: 305-789-7763
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PLEASE TAKE FURTHER NOTICE that pursuant to Section 1109(b) of the Bankruptcy Code, the foregoing demand includes not only the notices and papers referred to in the Rules specified above, but also includes, without limitation, orders and notices of any application, motions, petitions, pleadings, requests, complaints, demands, disclosure statements, plans of reorganization, and answering or reply papers whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, telecopier or otherwise.

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EASTERN DISTRICT OF MISSOURI
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PLEASE TAKE FURTHER NOTICE that neither this notice nor any later appearance, pleading, claim, or suit shall waive any right (1) to have final orders in non-core matters entered only after de novo review by a District Judge, (2) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case, (3) to have the District Court withdraw the reference in any matter subject to recoupments to which the Landlord is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: March 13, 2019.

HOLLAND & KNIGHT LLP

*Attorneys for Plaza las Americas, Inc.
and Plaza del Caribe, S.E.*

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By: 

Joaquin J. Alemany, Esq.
Florida Bar No. 662380

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing will be served via electronic transmission on all CM/ECF registered users for this case upon the filing of the hardcopy.

By: 

Joaquin J. Alemany, Esq.

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